I am an Extra Class amateur radio licensee, and have been continuously licensed since 1962.

I am writing in response to RM-10805, regarding changes to the F.C.C. requirements for Element 1 (the 5 word per minute Morse Code exam) of the Amateur Radio Service rules .

The existing CW requirements for the Amateur Radio Service should be retained. These requirements are extremely modest and require applicants to demonstrate the most meager proficiency with this mode.

However, knowledge and even modest proficiency of this mode should be considered a Homeland Security issue. Most domestic communications systems (amateur and non-amateur alike) are not "hardened" for protection against electro magnetic pulse (EMP). Our current domestic security planning has our society considering "the unthinkable". Such planning is appropriate, especially when we contemplate the disastrous results of 9/11.

In the event of further domestic terror it is conceivable that those who wish to hurt America could detonate an improvised or stolen nuclear weapon in one or more of our cities. The resulting EMP could render most modern solid state devices (police & fire radio systems, cell phones, land-based telephone systems, computers, the internet) inoperable. In such an "unthinkable" scenario, the Amateur Radio Service may provide the only non-military disaster communications available. In such an "unthinkable scenario", communications might only be possible using older (non-solid-state) equipment and even improvised communications devices. The use of Morse Code for communications could well be the only mode of wireless communication and compatibility. Such communications would be vital to the protection of life and property.

To remove the Morse Code proficiency requirement, in the interest of increasing the ranks of amateur radio operators, attracting new licensees, encouraging economic growth of electronics manufacturers, mirroring what other countries are doing, or of simply "making things easier" is misguided and ill-advised.

There remain several entry-level amateur radio license classes which do not require Morse Code proficiency, and this is appropriate. Prospective amateurs who wish to enter the service need not burden themselves with study and practice of the Morse Code. However those who wish to EARN additional privileges beyond the basic entry-level license classes should be required to show some level of Morse Code proficiency, and in so doing, will maintain and enhance the emergency response skills and capabilities of the Amateur Radio Service.

I request that the Commission REJECT any requests to eliminate the Morse Code requirements, and leave the current license requirements INTACT.

Respectfully submitted,

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